

6/1/93

The Ohio Bell Telephone Company

Suite 1400
45 Erieview Plaza
Cleveland, Ohio 44114
Phone (216) 822-3439

Thomas A. Linton
Senior Attorney

July 28, 1993

Kevin Turner
Remedial Project Manager
U.S. Environmental Protection Agency, HSRM-6J
77 W. Jackson Blvd.
Chicago, Illinois 60604

Re: Request for Information
Sanitary Landfill Co. (IWD) Site in Moraine, Ohio

Dear Mr. Turner:

Enclosed please find the response of The Ohio Bell Telephone Company to the most recent request for information in connection with the above-referenced site.

As you requested, we included in our response information regarding disposal of hazardous materials (used oil, batteries and lead-sheathed cables), although those materials were not directed to the site.

Please let me know if you have any further questions.

Very truly yours,

Thomas A. Linton

cc: J. Jaggers
J. Gaffney

RESPONSE TO INFORMATION REQUEST

Re: Sanitary Landfill Co. (IWD) Site, Moraine, Ohio.

The following responses were prepared by Thomas A. Linton, General Attorney - Litigation, The Ohio Bell Telephone Company, Room 1424, 45 Erieview Plaza, Cleveland, Ohio 44114, (216)822-3439.

REQUEST 1.

These responses are based on information supplied by:

John P. Gaffney

Manager - Environmental Compliance, The Ohio Bell Telephone Company ("Ohio Bell"), Room 720, 65 Erieview Plaza, Cleveland, Ohio 44114, (216)822-1748. Administrative responsibility for all environmental compliance matters for The Ohio Bell Telephone Company.

Charles Mansfield

Foreman - Building Operations (RETIRED), Ohio Bell. Responsible for supervision of maintenance of Ohio Bell buildings in Dayton, Ohio area, including arranging for removal of rubbish.

REQUEST 2.

In July 1987, all existing documents regarding all materials generated by Ohio Bell which may have gone to the site were collected in a file maintained by the Ohio Bell Legal Department. Copies of all such documents will be supplied upon request. However, see answers to remaining requests.

REQUEST 3.

No other knowledgeable persons are known to Ohio Bell.

REQUEST 4.

OHD000822346

REQUEST 5.

Ohio Bell has no direct knowledge of any such persons. PRP's have been identified in documents furnished by PRP groups.

REQUEST 6.

Ohio Bell has no knowledge that it generated hazardous substances either transported to or disposed of at the site.

Ohio Bell has no knowledge that it transported or caused others to transport hazardous substances to the site.

Ohio Bell has no knowledge that it disposed of or caused others to dispose of hazardous substances at the site.

During the period 1970 - 1981, Ohio Bell did generate several hazardous substances. However, to its knowledge they were disposed of as follows:

Lead acid batteries were sold to scrap dealers who salvaged the lead;

Telephone cable, including lead-sheathed cable, was sent by rail to the A.T. & T. Nassau facility in Gastonia, North Carolina, for recycling; and

Used motor oil (drained at motor vehicle service locations only) was collected in 550 gallon tanks and sold to oil recyclers.

Also during that period, one or the other of two companies, Industrial Waste Disposal ("IWD") and Blaylock Waste Removal (2250 Sandridge Rd., Dayton, Ohio), were hired by Ohio Bell to remove general rubbish from Ohio Bell's locations in the Dayton, Ohio area. The rubbish would consist mostly of paper and would include food waste, steel wire and copper wire trimmings too small to recycle. It would not include hazardous substances.

REQUEST 7.

See response to Request 6. Ohio Bell has no knowledge or information which would allow it to confirm or deny that materials described in its response to Request 6 were transported to the site by IWD on Ohio Bell's behalf on the dates set out in Request 7. To Ohio Bell's knowledge, it did not generate any hazardous materials which were disposed of at the site.

REQUEST 8.

Charles Mansfield. See response to Request 1 and 6. No other knowledge or information available.

Thomas A. Linton

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